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10 **UNITED STATES DISTRICT COURT**
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12 **CENTRAL DISTRICT OF CALIFORNIA**
13
14 **WESTERN DIVISION**

15 UNITED STATES OF AMERICA,
16 Plaintiff,
17 v.
18 PHILIP ALAN DRECHSLER,
19 Defendant.

20 Case No. 23-CR-00216-RGK

21 **STIPULATION TO CONTINUE
SENTENCING HEARING**

22 **Sentencing Date: December 2, 2024**

23 **Proposed Date: December 9, 2024**

24 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, United
25 States of America, by and through Assistant United States Attorney Bruce K. Riordan;
26 and defendant Philip Alan Drechsler, by and through his attorney of record, Deputy
27 Federal Public Defender Kate L. Morris, that:

28 1. On May 30, 2024, Mr. Drechsler entered a guilty plea, pursuant to a
written plea agreement, to count one of the indictment filed in this matter, which
charges distribution of child pornography, in violation of 18 U.S.C. §§ 2252A(a)(2)(A),
(b)(1). The Court set Mr. Drechsler's sentencing for October 7, 2024 and ordered the
preparation of a Presentence Report ("PSR"). The PSR was disclosed on August 30,
2024.

29 2. Mr. Drechsler is in custody and faces a five-year mandatory minimum

sentence. He has currently served approximately 18 months in detention.

3. Defense counsel requires additional time to prepare a mitigation package, which includes gathering and reviewing numerous records and character letters. Defense counsel has submitted various records requests and is still awaiting receipt of one set of records. Additionally, two of Mr. Drechsler's close friends wish to attend the sentencing hearing but are unavailable due to Thanksgiving travel plans on the current date of December 2, 2024. Consequently, the parties agree that a brief continuance of one week is appropriate.

4. This is the second request for a continuance of sentencing.

5. Accordingly, the parties respectfully request that the Court continue the sentencing hearing in this matter from December 2, 2024 to December 9, 2024.

Respectfully submitted,

CUAUHTEMOC ORTEGA

Federal Public Defender

DATED: October 25, 2024

By /s/ *Kate L. Morris*

Kate L. Morris
Deputy Federal Public Defender
Attorney for Philip Alan Drechsler

E. MARTIN ESTRADA
United States Attorney

DATED: October 25, 2024

By /s/ *Bruce K. Riordan (by email authorization)*

BRUCE K. RIORDAN
Assistant United States Attorney